



HM Prison &
Probation Service

Action Plan Submitted: 15th February 2019

A Response to: A thematic inspection of work with men convicted of sexual offences

Report Published: 24 January 2019

INTRODUCTION

Her Majesty's Inspectorate of Probation is the independent inspector of youth offending and probation services in England and Wales. It reports on the effectiveness of probation and youth offending service work with adults and children.

In response to the report, HMPPS/MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plan provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are published on the HMI Probation website. Progress against the implementation and delivery of the action plans will be monitored by HMPPS/MoJ and reviewed annually by HMI Probation.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.

ACTION PLAN: A thematic inspection of work with men convicted of sexual offences

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner (including named individuals and their functional role or department)	6. Target Date
1	<p>HM Prison and Probation Service should ensure that for both custody and community cases:</p> <p>Staff are provided with a clear approach to working with those convicted of sexual offences</p>	Agreed	<p>The Sex Offending Management Board (SOMB) meets at least quarterly and is responsible for ensuring a strategic and coherent HMPPS approach to management of men and women convicted of sexual offences. The Sex Offending National Reference Group (focused on managing sex offenders in the community) and the recently instigated Sex Offending Forum (focused on sex offenders in custody) both feed into this Board.</p> <p>HMPPS will produce a framework, articulating the priorities of the SOMB; describing the principles which underpin our work with those convicted of sexual offences and providing an evidence informed rationale focussed on identifying the priority issues for service implementation. In addition, a dedicated post to support the Deputy Director for Equalities, Interventions and Operational Practice Group has been created to coordinate the work undertaken in HMPPS on the management of those who have committed sexual offences. The Director General (DG) for Probation and Wales will hold ultimate responsibility for oversight of delivery of the above framework and this Action Plan. Both will be delivered through the Sex Offending Management Board, which will now be chaired by a Director. The Chief Probation Officer will also attend the Board</p> <p>A range of training and supporting materials are being developed to enable clarity about working with sex offenders. This includes:</p> <ul style="list-style-type: none"> • <i>'My Learning'</i> (training database) has been launched by HMPPS to provide staff with easy access to all training, including a number of available events in relation to working with those who have committed sexual offences. This database also provides staff and managers with an accurate record of the training completed. • A revised joint police and probation training package will improve the quality of Active Risk Management System (ARMS) assessments, ensuring that staff have a clear understanding of what constitutes a quality assessment. ARMS will be appropriately prioritised and performance monitored through analysis of Management Information. We will pilot a Quality Assurance tool and include guidance on how to 	<p>Head of Equalities, Interventions and Operational Practice Group</p> <p>DG for Probation and Wales; Director for Safety and Rehabilitation</p> <p>Deputy Director, Effective Probation Practice</p> <p>Head of Public Protection Group and Deputy Director, Effective Probation Practice</p>	<p>Completed</p> <p>July 2019</p> <p>Completed</p> <p>December 2019</p>

			<p>improve case recording. We are also exploring whether we can make use of ARMS assessments earlier in an offender's sentence, including the potential to do so in custody.</p> <ul style="list-style-type: none"> • A Model for Operational Delivery for those convicted of sexual offences has been developed to support prison establishments in working with their population. This toolkit brings together a comprehensive analysis of the latest evidence, supports successful delivery and acts as a resource which Governors can use to meet the needs of prisoners. This is an iterative set of material which will be promoted to custodial sites. This will be subject to regular review and amended as appropriate to ensure that the latest evidence is used and the changing needs of the prison population are met. • We will continue to provide staff training and delivery in prison establishments offering relevant accredited Offending Behaviour Programmes (OBPs), to enable staff to understand how to work with those convicted of sexual offences. We will also provide training to the wider staff group, to ensure an understanding of the programme content and aims. • The NPS has instigated national conferences to communicate a clear approach to working with those convicted of sexual offences. These conferences aim to improve awareness, confidence, theoretical understanding and forward-thinking approaches. Three conferences were delivered in 2018 with a fourth planned in early 2019. It has been agreed that further similar conferences will take place in 2019/20. • The NPS has launched '7-minute briefings' to condense key information, communicate strategic approaches and provide learning to staff (including to cover required approaches to working with those who have committed sexual offences). This includes both community and custodial programmes and information. To support this, 'bitesize' videos will be piloted with NPS Newly Qualified Officers in March 2019 and rolled out to all NPS staff in line with learning from this pilot. Work to provide access for prison staff is underway. • New Me MOT training (a toolkit of exercises developed in line with empirically supported effective characteristics of supervision) is available to both custody and community staff. A programme to ensure widespread delivery in the NPS will be rolled out over the next two years, commencing with all frontline staff in North East Division to be trained by April 2019. 	<p>Head of Reconfiguration</p> <p>Head of Psychological Services</p> <p>Deputy Director, Effective Probation Practice</p> <p>Deputy Director, Effective Probation Practice/Head of Psychology Services</p> <p>Head of Interventions Service</p>	<p>March 2020</p> <p>Completed.</p> <p>April 2019 and April 2020</p> <p>September 2019</p> <p>February 2021</p>
2	There are regular and comprehensive national analyses of offending-related risks and needs of	Agreed	HMPPS recognises the need for a comprehensive national analysis of offending related risks and needs of those convicted of sexual offences. The SOMB will drive improved coherence to the analysis of the cohort, with plans for delivery in custody and the community.	Head of Equalities, Interventions and Operational Practice Group	November 2019

	those convicted of sexual offences		<p>Delivery plans for all accredited programmes are implemented according to the risk and need of the population and of individuals. The 2019/ 20 Delivery Plan will be developed by May 2019 and reviewed annually thereafter. Establishments will continue to analyse the risk and needs of their population, to ensure appropriate case management and that prisoners are directed to available interventions as appropriate.</p> <p>The NPS Performance and Knowledge Management team are exploring the most efficient means by which to gather further meaningful data. Criminogenic need and risk data will be obtained via Offender Assessment System (OASys) National Reporting (ONR) for those whose Index Offence is coded as a sexual offence.</p>	<p>Head of Psychology HMPPS and Head of Intervention Services HMPPS</p> <p>Head of Performance and Knowledge Management, NPS</p>	<p>May 2019</p> <p>February 2019</p>
3	Promote closer working between CRCs, prison staff and the NPS so that there is continuity of resettlement support, effective public protection and oversight throughout the sentence	Agreed	<p>Under the Offender Management in Custody (OMiC) specification, the Prison Offender Manager (POM) will ensure effective coordination of the sentence during the custodial stage. For registered sex offenders, the POM will support joint working, information sharing and transition to a Community Offender Manager (COM) prior to release and NPS supervision. The COM will take responsibility for resettlement and public protection arrangements in the last months leading up to release.</p> <p>The contracts with Community Rehabilitation Companies (CRCs) provide for through the gate (TTG) services, even where a prisoner does not reside in a designated resettlement prison prior to release. We are, though, aware the performance of the probation system, including TTG resettlement services for prisoners leaving custody, is in need of improvement. Discussions with CRC providers have taken place and an enhanced TTG offer is currently being mobilised to increase the level of service by 1 April 2019. This applies to all resettlement prisons as well as the range of provision available to those being discharged from sex offender and non-resettlement prisons, via CRC rate cards. The National Probation Service, CRCs and prisons are working together to improve the services available. HMPPS will collect data to track prisoners' accommodation and employment on release. This data will be used to measure and drive up the performance of both prisons and probation services, to address obstacles and to provide incentives for improved joint working.</p> <p>Capacity plans in relation to those who have committed sexual offences are built into the Prison Estate Transformation Programme (PETP)'s new build and reconfiguration work, including removing barriers to improve flows to</p>	<p>Executive Director, Safety and Rehabilitation</p> <p>Deputy Director, CRC Contract Management</p> <p>Head of Prison Reconfiguration Project</p>	<p>December 2019</p> <p>April 2019</p> <p>March 2022</p>

			<p>resettlement prisons. The custodial Sex Offending Forum will provide feedback to the SOMB to understand the needs of staff in prisons due to receive an increase in numbers of prisoners who have committed sexual offences.</p> <p>The number of available Approved Premises places will be increased by 230 over the next two years. NPS will work with Local Authorities to help them ensure that, wherever possible, sex offenders are released to stable, risk assessed accommodation on release from custody and/or following a period at an Approved Premises. Temporary hotels will only be used when all other alternatives are exhausted, will be fully risk assessed (by Police and NPS) and will require the approval of the Chief Probation Officer or Director General for Probation.</p>	Chief Probation Officer	April 2021
4	Provide evidence informed interventions for offenders whose needs are not met by accredited programmes	Agreed	<p>HMPPS seeks to identify the most appropriate approach in line with the latest research for every offender. Frequently this may be to provide support to build strengths (e.g. in relation to education, accommodation and employment) to enable desistance. The Maps for Change Toolkit provides a resource to structure supervision with men convicted of sexual offences in the community, to promote evidence informed desistance factors and engagement. Maps for Change has been re-written and is now linked specifically to Active Risk Management System (ARMS) items, changes due for release in early 2019. HMPPS will review the current use of Maps for Change, to determine whether custodial delivery would be desirable.</p> <p>Specialist units are available or under development in key custodial establishments, to address the needs of complex individuals who are not progressing in their sentence, including lack of progress with Accredited interventions. This includes Personality Disorder (PD) units and counselling psychology provision. This provision will be subject to ongoing review.</p>	<p>Head of Equalities, Interventions and Operational Practice Group and Deputy Director, Effective Probation Practice</p> <p>Head of Psychological Services</p>	<p>April 2019</p> <p>May 2019</p>
5	The workforce is equipped to identify, assess and deliver appropriate interventions to manage the risk of harm presented by those convicted of sexual offences	Agreed	<p>Under the OMiC specification, all registered Sex Offenders will be subject to Offender Management by a suitably qualified member of staff throughout their sentence. We will ensure that they receive appropriate training to enable effective supervision.</p> <p>The available training for HMPPS staff is being updated and will ensure that the workforce is equipped to engage those convicted of sexual offences and manage the risk of harm that they present. This includes training opportunities for Keyworkers and Prison Offender Managers. Training is also being developed for Newly Qualified and experienced NPS Officers for release in</p>	<p>Executive Director, Safety and Rehabilitation</p> <p>Deputy Director, Effective Probation Practice and Head of Psychology</p>	<p>December 2019</p> <p>November 2019</p>

	Improve the integration of assessment tools and the quality of assessments and plans to ensure that the public, particularly children and actual and potential victims, are protected.		<p>In October 2018 a revised version of the Assessment Quality Assurance (AQA) tool was introduced, focussing on the quality of the core elements of NPS work: risk assessment, risk management and sentence planning. This includes measures to assure and improve the quality of key assessments and plans within OASys. The impact on quality is being evaluated, and will be available in February 2019.</p> <p>HMPPS will launch a revised joint police and probation training package, to improve the quality of Active Risk Management System (ARMS) assessments. The QA, Refresher and Assessor training packages will ensure that staff have a clear understanding of what constitutes a quality ARMS assessment.</p> <p>NPS will set up a mechanism for collecting Management Information on ARMS completion, put in place a performance management process and will issue guidance on the prioritisation of ARMS where there are staff shortages. The National ARMS team will provide further information on the strengths and weaknesses of ARMS, and therefore inform further practice development across HMPPS.</p> <p>Psychologists take account of available risk assessments when using additional specialist tools with those convicted of sexual offences, and are trained in new approaches as appropriate.</p> <p>NPS will strengthen risk management planning, including by ensuring a more coordinated approach to Home Visits with the police. NPS will revise guidance in relation to Home Visits, to set out more clearly the circumstances in which home visits are required, in particular, with respect to child safeguarding. Management Information will be used to monitor the use of Home Visits in appropriate cases.</p> <p>To ensure that polygraph testing can be used to strengthen Risk Management Plans where necessary, NPS have increased the size of the national polygraph team, and given instructions that will ensure that priority is given to higher risk cases.</p>	<p>Deputy Director, Effective Probation Practice</p> <p>Head of Public Protection Group</p> <p>Deputy Director, Effective Probation Practice</p> <p>Head of Psychological Services</p> <p>Deputy Director, Effective Probation Practice</p> <p>Head of Public Protection Group</p>	<p>February 2019</p> <p>February 2019</p> <p>December 2019</p> <p>Completed</p> <p>November 2019</p> <p>Completed</p>
8	Ensure that those allocated to work with sexual offenders are offered the appropriate level of professional and	Agreed	PAM Assist (an Employee Assistance Programme EAP and Wellbeing Service) offers Structured Professional Support for HMPPS staff (via line manager referral) that manage predominately high risk and complex caseloads. A new electronic referral process is being rolled out nationally to improve access and HMPPS are working with PAM Assist to ensure the	National Lead, Occupational Health & EAP, HMPPS and Probation Divisional	April 2019

	emotional support to deal with the complex, often difficult, nature of their caseloads		<p>services on offer meet the demands of our staff. Confidential counselling is available via the Employee Assistance Programme, which can be accessed through self-referral. Training workshops related to building resilience and identifying enhanced coping strategies are available and bespoke training days can be arranged as required; discussions are underway as to a specific offer for staff working with those convicted of sexual offences.</p> <p>In addition, the following professional and emotional support will be available to HMPPS staff, depending on their role and specific needs;</p> <ul style="list-style-type: none"> • A counselling service is available to those facilitating high intensity interventions (including programmes for those convicted of sexual offences) and eligibility has been broadened to include other staff who may work with or be exposed to difficult content or material. • Regular support from a Line Manager (e.g. Structured Supervision for NPS staff, Psychology staff and other specialists). NPS will implement a Supervisory and Line Management Meetings Framework (SLMMF) from April 2019. • Access to mentoring schemes or peer supervision (e.g. NPS and psychology pilots are underway). • Peer support (e.g. Virtual Networks will be launched in 2019 to network NPS staff more appropriately to discuss effective practice in working with those that have committed sexual offences). • Training (e.g. NPS will launch dedicated training for Newly Qualified Officers to support their work with those convicted of sexual offences. This can be accessed by all NPS staff, and has a core focus on resilience and supporting staff in the emotional impact of managing those who have committed a sexual offence). • Bespoke support (e.g. a briefing to help address concerns around Serious Further Offences and build understanding and resilience will be available to all managers in early 2019). • POMs and COMs will have access to psychologically informed consultancy in relation to cases screened into the Offender Personality Disorder (OPD) pathway programme. In addition to providing direct assistance in managing these complex cases, this aims to build capacity and skills in OM's for future cases. 	<p>Director for Business Strategy & Change</p> <p>Deputy Director, Effective Probation Practice and Head of Psychological Services</p>	September 2019
9	Ensure that MAPPA level setting is consistent, clearly communicated	Agreed	Multi Agency Public Protection Arrangements (MAPPA) Senior Management Boards (SMBs) are independent bodies and the statutory requirement to manage the risks presented by those with sexual and violent index offences	Head of Public Protection Group	September 2019

	across the responsible authorities, and underpinned by robust assessment and regular reviews		<p>rests with them. The national MAPPA Team will review the MAPPA Guidance (setting out the framework for level setting, communication across the responsible authorities, the assessment process and regular reviews). Clear guidance on minimum requirements for single agency management and review of Level One cases will be produced.</p> <p>MAPPA Guidance in relation to Custody has recently been updated, clearly setting out HMPS's responsibilities in relation to MAPPA. A new escalation procedure has been introduced for occasions when prisons are not informed of MAPPA levels. HMPPS will review the effectiveness of this process by September 2019.</p>	Head of Public Protection Group	September 2019
10	Ensure that accredited programmes are delivered in all appropriate cases	Agreed	<p>HMPPS's new suite of programmes is consistent with the latest evidence and has the assurance of accreditation by the Correctional Services Advice and Accreditation Panel (CSAAP). Programmes to address sexual offending within our New Delivery Model (NDM, November 2017) pay attention to the individual needs of each participant; place emphasis on the Risk, Need and Responsivity model of rehabilitation and adopt a strengths-based, future focussed approach in order to instil hope for a non-offending future. Focus is placed on the Dynamic Risk Factors which contributed to offending (Positive Relationships; Managing Life's Problems; Sense of Purpose; Healthy Sexual Interests and Healthy Thinking). HMPPS will review the demand for these programmes in comparison with the volume and location of those we provide, both in the community and in custody, to improve the available data and support the prompt allocation of eligible sex offenders onto programmes.</p> <p>Prioritisation of the provision of programmes for those that have committed sexual offences is implemented using assessments of risk and need. National data and local needs assessments will be used to improve the understanding of the risks/needs of the population. Planning will ensure that programme availability is aligned with these assessments, taking account of eligibility, readiness and resource constraints. Planning for 2019/20 has commenced.</p> <p>A working group is reviewing system improvements to the individual assessment process to identify those suitable for accredited programmes.</p>	<p>Head of Psychological Services, Deputy Director, Effective Probation Practice</p> <p>Head of Psychological Services</p> <p>Head of Psychological Services and Head of Interventions Services Head of Psychological</p>	<p>December 2019</p> <p>July 2019</p> <p>July 2019</p>

			Accredited Programmes for people with learning disabilities and challenges have been developed. Work to embed these programmes within custody and in the community is ongoing.	Services, Deputy Director, Effective Probation Practice	Completed
11	Train staff to deliver individual work programmes for use with sexual offenders who are not subject to an accredited sexual offending group work programme	Agreed	<p>Maps for Change is available to Offender Managers to inform work with those who are not subject to an accredited sexual offending group work programme, with changes due for release in early 2019. .</p> <p>Training and provision of materials is underway for staff working with sex offenders who are not subject to an accredited programme. This includes specific face to face training for working with those who have committed sexual offences commissioned by NPS (due to be available in late 2019), which will support the delivery of such work, including the use of Maps for Change. Regular communication, including through National Conferences, is used to brief and update staff regarding new developments in working effectively with those that have committed sexual offences.</p> <p>In partnership with NHS England, the OPD pathway is available to support work with people convicted of sexual offences, including those whose ability or willingness to undertake accredited offending behaviour programmes is impacted by Personality Disorder. Intensive Intervention and Risk Management, will be introduced to support Community Offender Managers (COMs) in engaging men and women screened into the OPD pathway and provide tailored interventions during their licence and will be available across most of England and Wales by the end of 2020. Therapeutic Communities are accredited interventions available in custody and offer a more appropriate treatment model than groupwork based Offending Behaviour Programmes in some cases.</p> <p>Within custody, the forum for Governors and other custodial staff groups in relation to those convicted of sexual offences, includes a workstream to consider further options for those for whom an accredited programme is not the appropriate pathway, concluding in March 2020.</p>	<p>Deputy Director, Effective Probation Practice</p> <p>Deputy Director, Effective Probation Practice</p> <p>Head of Psychological Services and Head of OPD Programme</p> <p>Head of Psychological Services</p>	<p>April 2019</p> <p>November 2019</p> <p>December 2020</p> <p>March 2020</p>
12	Ensure that all convicted sexual offenders in custody have an allocated NPS responsible officer and prison-based offender supervisor who is actively	Agreed	All Registered Sexual Offenders will be assigned to NPS according to agreed models. Once OMiC case management is implemented, a suitably trained Prison Offender Manager (POM) will ensure effective coordination of the sentence during the custodial stage of the sentence. A Senior Probation Officer will be located in every prison, to oversee the management of sexual	Executive Director, Safety and Rehabilitation	December 2019

	involved in managing the case.		and violent offenders in custody. Active management of the case will transition to a Community Offender Manager (COM) in readiness for release.		
13	<p>HM Prison Service should ensure that:</p> <p>Public protection procedures, including the monitoring of communications, are sufficiently robust and consistently applied</p>	Agreed	HMPPS will review the guidance in the Public Protection Manual on how to identify prisoners who pose a risk to children, to ensure it is clear, supports public protection, ensures effective assurance through Interdepartmental Risk Management meetings and is in line with legislation. All reviews of the need for continued communications monitoring will be undertaken by suitably competent staff, taking account of all relevant information about the prisoner. An electronic learning package for staff involved in the interception of communications will be launched.	Head of Public Protection Group	September 2019
14	Prisons make a more effective contribution in their role as a MAPPA responsible authority	Agreed	<p>The risk assessment and management element of the OASys training for prison staff has been re-written to better equip prison staff to complete quality assessments.</p> <p>The national MAPPA Team will review the MAPPA Guidance. This will include production of clear minimum requirements for single agency management. This will also set out the framework for communication across the responsible authorities, including prison contribution to MAPPA review meetings, and the support to be provided by prisons for cases co-ordinated by a single lead agency. HMPPS will consider an operational review of prison engagement, to ensure compliance with formal processes.</p> <p>The National MAPPA Team delivered presentations to the Regional Prison Group Directors in November and December 2018 promoting the value of ViSOR and the impact its use has in relation to MAPPA and protecting the public. HMPPS has improved the process for providing staff with access to ViSOR. To further support improved operational use of ViSOR across the prison estate HMPPS has reviewed the current mandatory training. Implementation of the updated training will begin by September 2019.</p>	<p>Head of Public Protection Group</p> <p>Head of Public Protection Group</p> <p>Head of Public Protection Group</p>	<p>Completed</p> <p>September 2019</p> <p>Completed</p>
15	All prisons have an active strategy to reduce reoffending, based on a current needs analysis, that sets out the steps to be taken with the	Agreed	The OMiC case management specification sets out the steps to be taken with any group of prisoners. Prisons will actively adhere to this specification, taking account of the framework for work with those convicted of sexual offences (see recommendation one). HMPPS will work closely with Prison Group Directors to assure effective implementation.	Director of Safety and Rehabilitation	December 2019

	population of convicted sexual offenders.		National data will continue to be used to enable Prison Group Directors to produce Offender Behaviour Programme delivery plans and strategies. The Prison Estate Transformation Programme Model for Operational Delivery for working with those convicted of sexual offences, will be considered by each site holding relevant offenders to ensure approaches are in line with the evidence, the population held, and wider HMPPS strategy.	Head of Analytical Services Directorate	March 2020
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